FORT HILL NATURAL GAS AUTHORITY POST OFFICE BOX 189 EASLEY, SOUTH CAROLINA 29641

Know what's below. Call before you dig.

June 8, 2021

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

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PSCSC Clerks Office

Dear Ms. Boyd:

Governor Henry McMaster recently requested that the South Carolina Office of Regulatory Staff "undertake a comprehensive review of our State's public and private power grid to evaluate its ability to withstand potential ice storms and other dangerous winter weather conditions." On March 10, 2021, the Public Service Commission issued an Order that, among other things, encouraged the non-regulated natural gas authorities, among others, to participate in this process by providing the requested information.

This letter contains Fort Hill Natural Gas Authority's (FHNGA) response to the above request with information detailing the history of Fort Hill Natural Gas Authority, the identification of potential threats to the utility service and the impact of potential threats to the utility service.

FHNGA owns and operates a natural gas distribution system (the "FHNGA System") which commenced service in 1952. It consists of three purchase points connected to the natural gas mains of Transco-Transcontinental Gas Pipeline, approximately 1973 miles of 2 to 10-inch diameter mains, and approximately 55,759 service lines connecting over 46,000 customer meters. As stated in our Enabling Act, Fort Hill serves the towns and municipalities of Central, Clemson, Easley, Liberty, Norris, Pelzer, Pendleton, Pickens, Seneca, Six Mile, Walhalla, West Pelzer, West Union, Westminster, and Williamston. This fact alone makes our future extremely important to our communities in the areas that we serve. Our employees and their families live, work, and go to school and church in the communities where Fort Hill provides energy needs for 46,000 customers in our tri-county area. Because of this, we take safety and reliability very seriously.

When our area experiences an electrical power outage, natural gas will continue to flow because the FHNGA System is not reliant on the power grid to maintain natural gas supplies. Natural gas transmission services in our area are provided by Williams Gas Pipeline, Transco Division. The transmission line is bi-directional. We receive supplies from the Appalachian Basins as well as the traditional wells in the Gulf.

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The natural gas supplies move along the transmission line by compressor stations. The compressor stations in South Carolina and Georgia have black start capability, meaning that they can operate independently of the power grid.

During inclement weather, industrial manufacturers typically curtail production to allow employees to stay home during hazardous road conditions. Historically, South Carolina citizens and businesses tend to stay home and shut down quickly at the onset of snow and ice, and our customers need a guarantee that they can work from home during these scenarios.

The FHNGA System is structured for reliability and resiliency. Most of our facilities are underground and not impacted by inclement weather. Moreover, field stations have battery backup that will last a minimum of three days. If power is out for an extended period, we have portable generators that are used to recharge the batteries on day two. At shared stations, we work in conjunction with other utilities to provide backup power or recharging stations. Fort Hill maintains off site storage at three locations on the east coast and we can pull an additional 5,364 dekatherms per day for up to seven days for peak demand. Please note that FHNGA has nearly 20 interruptible customers. These customers maintain an alternate fuel system so that during a curtailment, they will switch to their alternate fuel and can maintain normal operations without shutting down.

If we were to look at the Texas storm of 2021 as a utility failure, then we should look at the polar vortex of 2018 as a success for Fort Hill and South Carolina. During the polar vortex of 2018, Fort Hill maintained natural gas supplies to customers during the consecutive nine days when the temperature remained in the low teens and low twenties at night. Approximately 40 percent of the monthly volume was delivered to customers during the first nine days of January 2018. Of the 43,000 active customers during that period, there were only one to two customers per day that experienced an outage, and service was restored to each within hours. This is a huge accomplishment and proves our ability to protect FHNGA customers during the worst weather possible.

The biggest threat to the safety of our employees and customers and uninterrupted service is damage by third parties to our underground pipeline system, often during the excavation process. We are actively involved in SC811 and work with the agency to develop strategies to protect underground utility services. An extensive GIS mapping system provides detailed system information in the event of an incident in which someone damages one of our pipes. This system also connects to our customer information system to send notices to any customers who may be impacted.

Fort Hill exemplifies how resilient natural gas authorities are in the face of inclement weather. We are always looking, evaluating and adding to our local infrastructure to best serve our customers. The infrastructure of our individual gas system is the last and most important aspect of delivering gas to our customers. Fort Hill continuously spends considerable time evaluating our infrastructure, capacity, and gas supply to prepare for sever weather events.

In addition to having reliable service, our rates are very competitive. But above all else, we put safety and reliability first. Our mission is to provide safe and reliable gas to our communities, and we will continue to successfully pursue this mission as we expand and improve our services.

On behalf of Fort Hill Natural Gas Authority, thank you for the opportunity to provide comments responsive to your request. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Kenneth F. Porter President and CEO